

April 21, 2003

Re: Haulmark Industries, Inc. 039-17235-00253

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNPER.wpd 8/21/02

April 21, 2003

Mr. James Hosteler
Haulmark Industries, Inc.
P. O. Box 281
Bristol, IN 46507

Re: 039-17235
First Significant Permit Revision to
MSOP 039-15406-00253

Dear Mr. Hosteler:

Haulmark Industries, Inc. was issued a minor source operating permit on November 26, 2002, for a stationary custom cargo trailer manufacturing plant. A letter requesting a revision to this permit was received on February 18, 2003. Pursuant to the provisions of 326 IAC 2-6.1-6 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-6.1-6, the minor source operating permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this permit revision which includes this letter, the attached operating conditions applicable to these emission units, and revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

mm

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Haulmark Industries, Inc.
19224 C.R. 8
Bristol, Indiana 46507**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-15406-00253	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: 11-26-2002

1 st Significant Permit Revision No.: 039-17235	Pages Modified: 2,3,14,15
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 21, 2003

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]
- A.2 Emission Units and Pollution Control Equipment Summary

SECTION B GENERAL CONSTRUCTION CONDITIONS

- B.1 Permit No Defense [IC13]
- B.2 Definitions
- B.3 Effective Date of the Permit [IC13-15-5-3]
- B.4 Modification to Permit [326 IAC 2]
- B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]
- B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]
- B.7 Preventive Maintenance Plan [326 IAC 1-6-3]
- B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]
- B.9 Inspection and Entry [326 IAC 2-5.1(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]
- B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]
- B.11 Annual Fee Payment [326 IAC 2-1.1-7]

SECTION C SOURCE OPERATING CONDITIONS

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]
- C.2 Permit Revocation [326 IAC 2-1-9]
- C.3 Opacity [326 IAC 5-1]
- C.4 Fugitive Dust Emissions [326 IAC 6-4]
- C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements

- C.6 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]

- C.7 Compliance Requirements [326 IAC 2-1.1-11]
- C.8 Compliance Monitoring [326 IAC 2-1.1-11]
- C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.10 Compliance Response Plan - Preparation and Implementation

Record Keeping and Reporting Requirements [326 IAC 1-6-2]

- C.11 Malfunctions Report [326 IAC 1-6-2]
- C.12 Emission Statement [326 IAC 2-6]
- C.13 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.14 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2]
[IC 13-14-1-13]

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

- D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]
- D.1.2 Volatile Organic Compounds (VOC)
- D.1.3 Hazardous Air Pollutants (HAPs)
- D.1.4 Particulate [326 IAC 6-3-2(d)]
- D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.1.6 Testing Requirements [326 IAC 2-1.1-11]
- D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

D.1.8 VOC and HAP

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC
2-6.1-5(a)(2)]**

D.1.9 Record Keeping Requirements

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emission Limitations and Standards

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emission Limitations and Standards

Annual Notification
Malfunction Report

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

- (a) One (1) spray paint booth, identified as E1, equipped with one (1) HVLP spray gun, for metal cargo trailer coating, with a maximum capacity of 0.68 units per hour, using dry filters for overspray control, and exhausting to stack S1.
- (b) One (1) general assembly area for the assembling of metal cargo trailers, with a maximum capacity of 0.68 units per hour, identified as GA, exhausting to general ventilation.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied in the spray paint booth (E1) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as applied, for forced warm air (less than 90EC or 194 EF) dried coatings or extreme performance coatings.

Solvent sprayed from HVLP application equipment in the paint booth during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Volatile Organic Compounds (VOC)

The potential to emit volatile organic compounds (VOC) from the spray paint booth (E1) and general assembly area (GA) is less than one hundred (100) tons per year. Therefore, 326 IAC 2-7 does not apply. Any change or modification which increases the potential emissions to equal to or greater than one hundred (100) tons per year must be approved by IDEM, OAQ before any change is made.

D.1.3 Hazardous Air Pollutants (HAPs)

The potential to emit hazardous air pollutants (HAPs) from the spray paint booth (E1) and the general assembly area (GE) is less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of combined HAPs. Therefore, 326 IAC 2-7 will not apply. Any change or modification which may increase to potential emissions to ten (10) tons per year of a single HAP or twenty-five (25) tons per year of any combination of HAPs must be approved by IDEM, OAQ before any such change may occur.

D.1.4 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating shall be controlled by a dry particulate filter and the control device shall be operated in accordance with the manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground.

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these emission units and their control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Compliance with the VOC content and usage limitations contained in Condition D.1.1, D.1.2, and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.8 VOC and HAP

Compliance with Condition D.1.2 and D.1.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and hazardous air pollutant usage for the twelve (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1, D.1.2, and D.1.3.
 - (1) The amount and content of VOCs and HAPs of each coating material and solvent used.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a MSOP Significant Permit
Revision**

Source Background and Description

Source Name:	Haulmark Industries, Inc.
Source Location:	19224 C.R. 8, Bristol, Indiana 46507
County:	Elkhart
SIC Code:	3715
Operation Permit No.:	039-15406-00253
Operation Permit Issuance Date:	11-26-2002
Permit Revision No.:	039-17235
Permit Reviewer:	Madhurima D. Moulik

The Office of Air Quality (OAQ) has reviewed an application from Haulmark Industries, Inc. relating to the construction and operation of a stationary custom cargo trailer manufacturing plant.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) MSOP No. 039-15406-00253, Issued on November 26, 2002.

Explanation of Modification

The source has requested the modification of several permit conditions in Section D.1. This includes altering the language in Conditions D.1.1 and D.1.10, and deleting Condition D.1.6, related to the removal of volume weighted averaging for coatings to meet requirements of Rule 326 IAC 8-2-9.

Justification for the Revision

The MSOP is being modified through a Significant Permit Revision. The requested changes do not meet the requirements for a notice-only change as defined in 326 IAC 2-6.1-6(d), or those of a Minor Permit Revision as defined in 326 IAC 2-6.1-6(g). Therefore, pursuant to 326 IAC 2-6.1-6(i)(1) for "changes that are not subject to subsection (d) or (g)" a Significant Permit Revision will be granted.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and

additional information submitted by the applicant.

A complete application for the purposes of this review was received on February 18, 2003.

Conclusion

The operation of this stationary custom cargo trailer manufacturing plant shall be subject to the conditions of the MSOP Significant Permit Revision No.: 039-17235-00253.

CHANGES TO PERMIT

(1) Condition D.1.1 is modified as follows:

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the ~~volume-weighted average~~ volatile organic compound (VOC) content of coatings applied in the spray paint booth (E1) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as applied ~~for any calendar day~~, for forced warm air (less than 90EC or 194 EF) dried coatings or extreme performance coatings.

(2) Condition D.1.6 is deleted, and the rest of the subsections are re-numbered.

~~D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]~~

~~Compliance with the VOC content limit in condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume-weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:~~

$$\text{A} = \frac{3 \text{ C} \times \text{U}}{3 \text{ U}}$$

~~Where: A is the volume-weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied;
and U is the usage rate of the coating in gallons per day.~~

(3) Condition D.1.10 is modified as follows:

D.1.10 9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3 the Permittee shall maintain records in accordance with (1) through (6 5) below. Records maintained for (1) through (6 5) shall be taken and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1, D.1.2, and D.1.3.

(1) The **amount and content of** VOCs and HAPs ~~content~~ of each coating material and solvent used.

~~(2) The amount of coating material and solvent less water used on daily basis.~~

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(4) The Table of Contents is modified to re-number subsections of section D.1.